

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 24-CR-20341-ALTMAN(s)

UNITED STATES OF AMERICA

vs.

**ROLANDO RAMIREZ,
RASHEED ALI, a/k/a “Fresh,”
TAMRAT SHIFTA MASON, a/k/a “Shifta,”**

Defendants.

/

GOVERNMENT’S AMENDED WITNESS AND EXHIBIT LIST

The Government, by and through the undersigned Assistant United States Attorney, respectfully submits the following list of witnesses and exhibits as it relates to the trial in the above- styled action.

The Government requests leave to add exhibits as they may become necessary during the trial in this matter.

Respectfully submitted,

HAYDEN P. O’BYRNE
UNITED STATES ATTORNEY

By: /s/ Abbie D. Waxman

Abbie D. Waxman
Assistant United States Attorney
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Tel: 305-961-9240
Email: Abbie.Waxman@usdoj.gov

Presiding Judge: The Honorable Roy K. Altman					AUSAs: Abbie D. Waxman and Michael Gilfarb	Defendants' Attorneys: Philip Reizenstein Eric Schwartzreich Richard Merlino Dustin Tischler
USA No.	Def. No.	Date Offered	Date admitted	Witness	Court Reporter: Francine Salopek	Courtroom Deputy: Janier Arellano
WITNESSES:						
1.					Alex Vega	
2.					Ryan Dreibelbis, FBI	
3.					Aymara Vega	
4.					Adriel Vega	
5.					Yvonne Garcia, MDPD (Retired)	
6.					Jose Llerena	
7.					Jaime Serrano	
8.					Lianko Ramirez	
9.					Edwin Carias	
10.					Juan Lombana	
11.					Julio Betancourt, MDPD	
12.					Jaime Bethel, MDPD	
13.					David Hardin, GCSO	
14.					Timothy "Judah" Pent, FBI	
15.					Marcos Jimenez	
16.					Michael Baez	
17.					Alexei Berbick	
18.					Larry Hendricks, MDPD	
19.					Hector Garcia-Balbin, MDPD	
20.					Jared Jukel	
21.					Oscar Ali	

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22.					Frank Gil	
23.					Dr. Naaman Abdullah	
24.					David Bernreuther	
25.					Juan Ramirez	
26.					Julian Flores	
27.					Freddy Pena	
28.					Alex Reyes	
29.					Garrett Hellman	
30.					Cindy Barrois, FBI	
31.					Gregory Hoffman, FBI	
32.					Sara Rios-Ordonez	
33.					Asia Lister	
34.					Alexya Chapoteau	
35.					Angel Febres	
36.					Dore Chaponik	
37.					Derrick Enriquez	
38.					Carlos Perez	
39.					Alex Muniz	
40.					Brendan Acquaviva, FBI	
41.					Yalene Marissa Gonzalez	
42.					Manuel Hernandez	

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EXHIBITS:

1.					Residential (1 Vega) 10620 SW 118 Avenue, Miami Shortened Clip
2.					Residential (2 Vega) 10620 SW 118 Avenue, Miami Shortened Clip
2a.					Photo Still of Shooter in Mask
2b.					Photo Still of Shooter in Gloves
3.					Residential 1 - 11756 S.W. 106 Terrace, Miami Shortened Clip 1
3a.					Shortened Clip 2
3b.					Location and Directional Map
3c.					
4.					Residential 1 - 11756 S.W. 106 Terrace, Miami Shortened Clip 1
4a.					Shortened Clip 2
4b.					Location and Directional Map
4c.					
5.					Residential (Park) – 11731 S.W. 108 Lane, Miami Shortened Clip 1
5a.					Shortened Clip 2
5b.					Shortened Clip 3
5c.					Shortened Clip 4
5d.					Location and Directional Map
5e.					
6.					Residential 1 11702 S.W. 106 Terrace, Miami Location and Directional Map
6a.					
7.					Residential 2 11702 S.W. 106 Terrace, Miami Location and Directional Map
7a.					
8.					Commercial/Plaza Corner/ 117 Avenue, Miami Business Record Certification (Sp)

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8a.					Business Record Certification (Trans.) Location and directional map	
8b.						
8c.						
9.					Sunpass Certification and Images	
10a.					Enterprise Rental Video (Versa)	
10b.					Photo still of Nissan Versa	
10c.					Enterprise Rental Video (Rogue)	
10d.					Photo still of Nissan Rogue	
10e.					Photo still of Nissan Rogue 2	
10f.					Enterprise Counter Video	
10g.					Photo still of Enterprise counter	
10h.					Photo still garage 1	
10i.					Photo still garage 2	
10j.					Photo still garage 3	
11.					FBI drive to Doral Collision	
12.					Julian Jimenez	
13a.-p.					ALI residence (Search Warrant March 2023)	
14a.-o.					ALI residence (Search Warrant August 2024)	
14p.-s.					Burner Phones Recovered	
15.					Impala Title	
16a.-b.					Juan Ramirez a/k/a "Shampoo" Phone Extraction Chat Transfers	
17a.					Lightened Image	
17b.					Recording making lightened image	
18.					Firearm DNA Swabs	
19.					Juan "Shampoo" Ramirez	

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20a.-e.					Typhani ALI Residence (Consent Search August 2024)	
21a.-e.					Mari Oba Photographs	
22a.-g.					Juan Ramirez CashApp Photographs	
23a.-e.					ALI Layne Boulevard (Consent Search August 2024)	
24a.-c.					Timeless Cannabis Instagram	
25.					MASON Facebook photographs	
26a.-i.					FDC Miami visitation area	
27. 27a.-f.					Shirt Photographs of shirt in vehicle	
28. 28a.-e.					Ballistics/ Projectiles (2) / Body of Alex Vega Photographs	
29. 29a.-g					Ballistic/ Casings (5) / Residence Photographs	
30.					Ballistic/ Casing (1)/ Residence	
31. 31a.-h.					Ballistic/ Projectiles (2) / Fragment (1) Vehicle Photographs	
32. 32a.					Ballistic/ Projectile and Fragments (Driver's Seat), Projectile (shoe box trunk) Photograph	
33. 33a.-g.					Mask Photographs from scene	
34. 34a.-e.					Gloves Photographs from scene	
35a. 35b.-m.					Ballistics/ Firearm, Magazine, Test Fires Photographs	

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36. 36a.					Aerial Image Aerial Image with Evidence Locations	
37. 37a.					Jimenez Swab Jimenez Photograph	
38.					Unfired cartridges	
39a. 39b. 39c. 39d. 39e. 39f. 39g. 39h. 39i. 39j.					Westchester County Jail 8/11/22 Transcript Westchester County Jail 8/13/22 Transcript Westchester County Jail 8/23/22 Transcript Federal Detention Center – Miami 10/6/23 Transcript Federal Detention Center – Miami 10/14/23 Transcript	
40a. 40b.					ALI FBI Interview Audio Transcript	
41a.-d.					MASON FBI interview 1 (November 29, 2022) Transcript MASON FBI interview 2 (November 29, 2022) Transcript	
42a.-h.					Mason FBI Interview (August 18, 2022) Transcript Mason FBI Interview (October 24, 2022) Transcript Mason FBI Interview Part 1 (November 18, 2022) Transcript Mason FBI Interview Part 2 (November 18, 2022)	

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					Transcript	
43a.-s.					RAMIREZ Jail Calls Transcripts	
44a. 44b.					Stephan Adams Jail Call to ALI Transcript	
45a. 45b.					FDC Miami Consent Recording Transcript	
46.					GreenDot Business Record (Jimenez and Serrano) Records	
47.					Block/ Cash App for Jaime Serrano	
48.					Serrano Call Detail Records June 29, 2019 – March 24, 2023 (914) 536-0429	
49.					American Airlines (Jimenez)	
50a.-b.					Flight Records and Manifest	
51a. 51b. 51c. 51d. 51e.					Enterprise Rental Records (Internal) Enterprise Rental Summary Enterprise Itemized Receipt of Toll Hits Enterprise Rental Records (Internal and License Plate Information) Enterprise Nissan Versa Maintenance	
52.					Serrano FDC Miami TRULINCS Email	
53.					RAMIREZ iCloud Subscriber page Apple ID: Roly@doralcollision Tadeo Text Messages 2012 Tadeo Text Messages 2013 Tadeo Text Messages 2014 Fonseca Text Thread 2012 Fonseca Text Messages 2014 Lianko Text Messages 2019 Berreuther Text Messages 2019 Jukel Text Messages 2019 ALI Text Messages 2019	

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					ALI Text Messages 2020 Attribution	
54.					ALI iCloud ("Big Sheed") Subscriber page "Greenlight" (Serrano) Text Messages 2019 "Clay Helton" (Swaby) Text Messages 2019 "Fernando Clay" (Carias) Text Messages 2019 "Omar Autobody" Text Messages 2019 "Lex Food Dude" (Berwick) Text Messages "Shifta" (MASON) Text Messages 2021 "Greenlight" (Serrano) WhatsApp Messages 2016 "Greenlight" (Serrano) WhatsApp Messages 2020-2022 "Shifta" (MASON) Phone ending 3727 WhatsApp Messages 12/19/2017 – 10/11/2022 "Shifta" (MASON) Phone ending 7107 WhatsApp Calls 11/2022 Attribution	
55. 55a.- 55dd.					ALI Burner Phone ending 8851 Photographs and Images	
56. 56a.-f.					ALI Phone ending in 9346 Call logs Photographs and videos (marijuana) Signal® Messages with "johnwickja279" (MASON)Phone ending in 5535 WhatsApp messages ("Jelin Vargas") Google Search Attribution	
57.					MASON iCloud ("johnwick275921", "Shifta Mason", fraskreqmusic") Subscriber page (Including 3727 and 7107) "Raga" (Serrano) Phone ending 3357 messages with MASON Phone ending 1298 Photograph of MDPD Det. Hendrick's business card Records of ledgers and shipments Photographs of Signal® messages with ledgers 08/2020 Photograph of WhatsApp message with "Greenlight" with ledger 08/2020	

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					Photographs of documents related to trucking company Photograph of One Trucking Company Attribution	
58a. 58b.					MASON Phone (Seized April 1, 2023) Subscriber Page WhatsApp messages with "Gl" with phone number 347-419-0946 (Serrano) 10/14/2021-08/06/2022	
59. 59a.					MASON phone ending in 5535 Subscriber Page Call logs Videos and Photographs(marijuana) Signal® messages with "Sk" ALI Phone ending in 9346	
60a. 60b.					Serrano Flip Phone Call logs Serrano Text messages with MASON Phone ending 1298	
61.					Serrano Infinity Purchase Sept. 1, 2019	
62.					Lyft	
63a. 63b.					Business Record Certification for Telephone/ Call Detail and Location Data/Jaime Serrano Call Detail Records Subscriber Information	
64a. 64b.					ALI "TD Bank" Business Record Certificate Church Rent Deposit	
65.					Instagram/ Jaime Serrano Floral Shirt Photograph Driveway with cars various	
66.					Serrano iCloud Photographs	
67.					Serrano TD Bank Account 8119	
68.					Business Record Certification for Telephone/ Call / Detail and Location Data Julian Jimenez Call Detail Records Subscriber Information LTE Records	
69.					Business Record Cert for Telephone/Call/Detail and Location Data for MASON 3727 (7/27/20-9/30/20) Business Record Cert for Telephone/Call/Detail Records	

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					for MASON 3727 (1/1/22-1/10/23) Business Record Cert for Telephone/Call/Detail and Location Data for MASON 3727 (8/10/22-3/27/23)	
70.					Business Record Cert for Telephone/Call/Detail and Location Data for MASON 7107 (10/11/22-3/28/23) Business Record Certificate for Telephone/Call/Detail Records for MASON 7107 (1/1/19-1/4/23)	
71.					Business Record Certificate for Telephone/Call/Detail Data for MASON 1298 (9/1/23-1/15/24) Business Record Certificate for Telephone/Call/Detail Records for MASON 1298 (8/1/19-9/21/23)	
72a. 72b.					Business Record Certificate Telephone/Call/Detail Data for MASON 8801 (9/1/23-1/15/24)	
73.					Business Record Certificate for Telephone/Call/Detail and Location Data for ALI 5702 (8/1/19-9/9/19) Call Detail Records Business Record Cert for Telephone/Call/Detail for ALI 5702 (1/1/22-1/10/23) Business Record Cert for Telephone/Call/Detail and Location Data for ALI 5702 (8/10/22-1/6/23) Business Record Cert for Telephone/Call/Detail and Location Data for ALI 5702 (1/6/23-3/7/23)	
74a. 74b. 74c.					Verizon Subscriber Information for ALI TracFone ending in 3675, 9490, 6490 found in ALI's Aventura Residence TracFone Subscriber Information for ALI TracFone ending in 3675 found in ALI's Aventura Residence TracFone Subscriber Information for ALI TracFone ending in 9490 found in ALI's Aventura Residence	

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74d.					TracFone Subscriber Information for ALI TracFone ending in 6490 found in ALI's Aventura Residence	
75a.					Business Record Cert for Telephone/Call/Detail and Location Data for RAMIREZ 2449 (2/1/19-3/1/19) and Telephone/Call/Detail and Location Data for RAMIREZ 2449 (8/1/19-9/9/19)	
75b.					Business Record Cert for Telephone/Call/Detail for RAMIREZ 2449 (3/1/19-8/16/24)	
75c.					Business Record Certificate for Telephone/Call/Detail and Location Data for RAMIREZ 2449 (8/10/22-3/27/23)	
76a.					Ali Grand Jury Subpoena	
76b.					Ali Grand Jury Subpoena Answer	
77a.					Business Record Certification Bank/ TD Bank Alexandra Owens \$1100 Deposit Statement page showing \$1100 deposit	
77b.						
77c.						
77d.					Statement page with transfer to ALI	
78a.					Wendy's Business Record Certificate	
78b.					Wendy's receipt	
79a.					Pollo Tropical Business Record Certificate	
79b.					Pollo Tropical receipt	
80.					Federal Detention Center Jaime Serrano housing	
81a-j.					Doral Collision v. Alex Vega RAMIREZ Deposition	
82a.-e.					ALI Phone (Seized in 2023) ending in 5702 screen recordings	
83.					Summary Exhibit	

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84.					C.A.S.T. Analysis Report	
85.					Business Record Cert for Telephone/Call/Detail for Yalene Marissa Gonzalez 9544 (01/01/2022-01/10/2023) Telephone/Call/Detail and Location Data for Yalene Marissa Gonzalez 9544 (08/10/2022-03/27/2023)	
86.					Business Record Cert for Telephone/Call/Detail Records and corresponding records for Alexandra Owens 8594 (01/01/2019-08/24/2022)	
87.					RAMIREZ text messages from telephone 2449 with ALI telephone 5702	
88.					Jaime Serrano DNA Swab	
89.					2015 New York Burglary Report	
90.					RAMIREZ Residence Search (March 2023)	
91.					ALI 2024 Phone ending in 5702	
92.					Racket Absence of Nore/Timeless Promotion	
93.					Foreign Religion Screenshot	
94.					Stipulations	
95.						
96.						

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 29, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

/s/Abbie D. Waxman
Assistant United States Attorney